

Exhibit A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION

KIMBERLY and JOHN STAPLES,

Plaintiffs,

V.

H. WALKER ENTERPRISES, LLC,
RENAISSANCE MAN FOOD
SERVICES, LLC, and
SIMMONS,

Defendants.

Case No. 7:18-cv-00160-LSC

**DECLARATION OF TALLEY R. PARKER IN SUPPORT OF
DEFENDANT SIMMONS PREPARED FOODS, INC.'S
OPPOSITION TO PLAINTIFF KIMBERLY STAPLES'
MOTION FOR SUMMARY JUDGMENT AS TO LIABILITY**

1. My name is Talley R. Parker. I am over 21 years of age and am fully competent to make this declaration. I have personal knowledge of all facts recited herein and state that such facts are true and correct.

2. I am an attorney with the law firm of Jackson Lewis P.C., 500 N. Akard, Suite 2500, Dallas, Texas 75201, and I represent Defendant Simmons Prepared Foods, Inc. (“Simmons”) in the above-referenced action. I respectfully submit this declaration in support of Simmons’ Opposition to Plaintiff Kimberly Staples’ (“Mrs. Staples”) Motion for Summary Judgment as to Liability (“Motion”).

3. Attached as Exhibit 1 to Simmons' Opposition to Mrs. Staples' Motion is a true and correct copy of the oral deposition of David Jackson.

4. Attached as Exhibit 2 to Simmons' Opposition to Mrs. Staples' Motion is a true and correct copy of the oral deposition of Kimberly Staples.

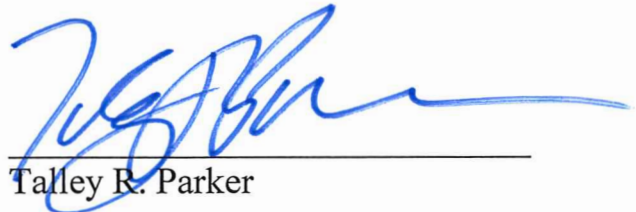
5. Attached as Exhibit 3 to Simmons' Opposition to Mrs. Staples' Motion is a true and correct copy of the oral deposition of John Staples.

6. Attached as Exhibit 4 to Simmons' Opposition to Mrs. Staples' Motion is a true and correct copy of a check representing a commission payment sent to Direct Sales and Marketing, LLC from Renaissance Man Food Services, LLC's bank account.

7. Attached as Exhibit 5 to Simmons' Opposition to Mrs. Staples' Motion is a true and correct copy of a recorded transcript of John Staples' termination meeting with Herschel Walker on December 27, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 4, 2019.



Talley R. Parker